

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANTHONY PAUWELS, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE  
HUANG,

Defendants.

Case No. 1:21-cv-00515-ALC

CLASS ACTION

ZHONGXUN YANG, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE  
HUANG,

Defendants.

Case No. 1:21-cv-00721-ALC

CLASS ACTION

JOSEPH FRANKLIN MONKAM NITCHEU,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE  
HUANG,

Defendants.

Case No. 1:21-cv-02262-ALC

CLASS ACTION

**DECLARATION OF JEFFREY C. BLOCK IN SUPPORT OF JOSEPH FRANKLIN  
MONKAM NITCHEU'S MOTION FOR CONSOLIDATION, APPOINTMENT AS  
LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF LEAD COUNSEL**

I, Jeffrey C. Block, declare, under penalty of perjury:

1. I am the Managing Partner of the law firm of Block & Leviton LLP. I submit this declaration in support of the motion of Joseph Franklin Monkam Nitcheu to consolidate cases, for appointment as lead plaintiff, and for approval of his selection of counsel.

2. Attached hereto as Exhibit A is a copy of a press release issued by Glancy Prongay & Murray LLP, dated January 20, 2021, announcing the filing of a class action, with a class period of December 21, 2020 to January 8, 2021, against the above-referenced defendants, and noticing that the filing date for appointment as Lead Plaintiff is March 22, 2021.

3. Attached hereto as Exhibit B is a copy of a press release issued by Block & Leviton LLP, dated March 16, 2021, announcing the filing of the above-captioned *Nitcheu* action and that the class period was updated to run from December 21, 2020 to January 11, 2021, and reiterating that the filing date for appointment as Lead Plaintiff is March 22, 2021.

4. Attached hereto as Exhibit C is Mr. Nitcheu's PSLRA Certification.

5. Attached hereto as Exhibit D is a chart reflecting Mr. Nitcheu's losses in the relevant securities.

6. Attached hereto as Exhibit E is Mr. Nitcheu's Declaration.

7. Attached hereto as Exhibit F is a true and accurate copy of the firm resume of Block & Leviton LLP, proposed Lead Counsel.

Dated: March 22, 2021

/s/ Jeffrey C. Block  
Jeffrey C. Block

**CERTIFICATE OF SERVICE**

I hereby certify that on March 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Jeffrey C. Block  
Jeffrey C. Block